

EXHIBIT 14

Woodfin's Motion to Reconsider

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

MAYOR RANDALL L. WOODFIN,	}	
In his official and individual capacities, et al.,	}	
	}	
Plaintiffs,	}	CASE NO.: 2:25-CV-00352-ECM-JTA
vs.	}	
	}	
GOVERNOR KAY IVEY, et al.,	}	OPPOSED
	}	
Defendants.	}	

**PLAINTIFFS' MOTION TO RECONSIDER THE DENIAL OF PLAINTIFFS'
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND DECLARATORY RELIEF**

COMES NOW, the Honorable Mayor Randall L. Woodfin, officially as Mayor of the City of Birmingham, and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; Clinton P. Woods, officially as a Birmingham City Council member, and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; Hunter Williams, officially as a Birmingham City Council member; Valerie A. Abbott, officially as a Birmingham City Council member and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; Jonathan T. Moore, officially as a Birmingham City Council member, and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; Darrell O'Quinn, officially as a Birmingham City Council member, and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; Crystal Smitherman, officially as a Birmingham City Council member; Wardine T. Alexander, officially as a Birmingham City Council member; Carol E. Clarke officially as a Birmingham City Council member, and individually as a citizen and ratepayer for water services provided by the Birmingham

Water Works Board; LaTonya Tate, officially as a Birmingham City Council member, and individually as a citizen and ratepayer for water services provided by the Birmingham Water Works Board; and the City of Birmingham, a municipal corporation (referenced hereafter collectively as the “City Plaintiffs”), by and through their attorneys of record, and hereby file this motion for reconsideration of this Honorable Court’s order denying their motion for a restraining order. In support of their motion, the City Plaintiffs state the following:

1. On or about May 6, 2025, the City Plaintiffs filed a motion for emergency temporary restraining order, preliminary injunction, and declaratory relief. (Doc. 2).

2. That same day, this Honorable Court entered an order denying the City Plaintiffs’ request for relief to “the extent [that they sought] temporary restraining order without first affording Governor Ivey an opportunity to be heard.” (Doc. 5).

3. This Honorable Court instead set a hearing on the City Plaintiffs’ emergency motion for May 15, 2025, at 9 a.m. *Id.*

4. Since the entry of this Honorable Court’s order, based on knowledge, information, and belief, the City Plaintiffs have perfected service of the summons, complaint, and emergency motion for injunctive relief on both the Governor and the Attorney General.

5. On or about May 7, 2025, Governor Ivey signed SB330¹.

6. Based on knowledge, information, and belief, on or about May 7, 2025, the Birmingham Water Works Board voted to sell the assets under its management back to the City of Birmingham.

¹ The Bill is now Alabama Act 2025-297. For clarity and consistency, the City Plaintiffs will refer to this Act as “SB330.”

7. As discussed at length in the City Plaintiffs' motion, SB330 violates the United States Constitution, federal law, and the Constitution of the State of Alabama. (Doc. 2). Each of these flagrant violations are the impetus for the City Plaintiffs' pursuit of immediate emergency injunctive relief.

8. Thus, due to the rapidly changing events, which have an immediate impact to the City Plaintiffs' U.S. constitutional, federal statutory, and Alabama State constitutional rights, an expedited emergency hearing is needed to prevent further immediate, irreparable harm to the City Plaintiffs.

WHEREFORE, PREMISES CONSIDERED, the City Plaintiffs respectfully ask this Honorable Court to reconsider its denial of the City Plaintiffs' request for emergency temporary restraining order and other injunctive relief and set an emergency expedited hearing before May 15, 2025. Further, the City Plaintiffs' request that this Honorable Court award any other relief it deems appropriate.

Respectfully Submitted,

/s/Nicole E. King

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City Attorney

/s/ Joseph R. Abrams

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/s/ Samantha A. Chandler

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 2025, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF filing system, and served a copy of said pleading by personal service and/or by placing in the U.S. Mail, postage prepaid, affixed and addressed to:

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